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8 **IN THE UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 MARC J. RANDAZZA, an individual,)
11 JENNIFER RANDAZZA, an individual, and)
12 NATALIA RANDAZZA, a minor,)

13 Plaintiffs,)

14 vs.)

15 CRYSTAL COX, an individual, and ELIOT)
16 BERNSTEIN, an individual,)

17 Defendants.)
18)

Case No.:

**[PROPOSED] TEMPORARY
RESTRAINING ORDER**

19
20 This matter having come before the Court on behalf of Plaintiffs Marc J. Randazza, Jennifer
21 Randazza, and Natalia Randazza ("Plaintiffs"), and good cause appearing therefore, this Court
22 hereby finds and orders as follows:

23 1. This Court has subject matter jurisdiction pursuant to 15 U.S.C. § 1121 and
24 28 U.S.C. §§ 1331 and 1338;

25 2. The Court has personal jurisdiction over the Defendants in that Defendants
26 committed tortious acts that they knew or should have known would cause injury to Plaintiffs in the
27 State of Nevada;

28 3. Plaintiff Marc Randazza's personal name serves as a common law mark.

1 4. Defendants have used Plaintiffs' marks as part of the following Internet domain
2 names without Plaintiffs' authority or permission:

- 3 a. <marcrandazza.me>
- 4 b. <marcrandazza.com>
- 5 c. <marcjrandaazza.com>
- 6 d. <fuckmarcrandazza.com>
- 7 e. <marcjohnrandazza.com>
- 8 f. <marcrandazzasucks.com>
- 9 g. <marcrandazzaisalyingasshole.com>
- 10 h. <marcrandazza.biz>
- 11 i. <marcrandazza.info>
- 12 j. <marcrandazza.mobi>
- 13 k. <marcrandazzaparody.com>
- 14 l. <exposemarcrandazza.com>
- 15 m. <randazzalegalgroupsucks.com>
- 16 n. <trollmarcrandazza.com>
- 17 o. <hypocritemarcrandazza.com>
- 18 p. <crystalcoxmarcrandazza.com>
- 19 q. <marcjohnrandazza.blogspot.com>
- 20 r. <randazzalegalgroup.blogspot.com>
- 21 s. <marcrandazzaviolatedmylegalrights.blogspot.com>
- 22 t. <markrandazza.blogspot.com>
- 23 u. <marcrandazza.blogspot.com>
- 24 v. <jenniferrandazza.blogspot.com>
- 25 w. <marcrandazzafreespeech.blogspot.com>
- 26 x. <marcrandazzaegomaniac.blogspot.com>
- 27 y. <marcjrandaazza-lawyer.blogspot.com>
- 28 z. <marc-randazza.blogspot.com>

1 aa. <marcrandazzawomensrights.blogspot.com>

2 bb. <marcrandazza-asshole.blogspot.com>

3 cc. <marcrandazzatips.blogspot.com>

4 dd. <marcrandazzaabovethelaw.blogspot.com>

5 ee. <marcrandazzaliedaboutcrystalcox.blogspot.com>

6 ff. <janellerandazza.blogspot.com>;

7 5. Plaintiffs will suffer irreparable injury if the Court does not require the domain
8 name registrar GoDaddy.com ("Registrar") to lock the Infringing Domain Names and transfer them
9 to Plaintiffs pending litigation of this matter;

10 6. Plaintiffs have demonstrated likelihood of success on the merits of their
11 cybersquatting claims against Defendant under the Lanham Act, 15 U.S.C. § 1125(d);

12 7. Plaintiffs have demonstrated likelihood of success on the merits of their mark
13 infringement claims against Defendant under the Lanham Act, 15 U.S.C. § 1114;

14 8. Plaintiffs have demonstrated likelihood of success on the merits of their right of
15 publicity claims under Nevada law;

16 9. Plaintiffs have demonstrated likelihood of success on the merits of their common
17 law right of publicity claims;

18 10. Plaintiffs have demonstrated likelihood of success on the merits of their common
19 law intrusion upon seclusion claims;

20 IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Marc J. Randazza's,
21 Jennifer Randazza's, and Natalia Randazza's Motion for Ex Parte Temporary Restraining Order is
22 hereby GRANTED;

23 IT IS FURTHER ORDERED that, pursuant to 15 U.S.C. § 1125(d)(1), the following
24 Infringing Domain Names shall be locked by GoDaddy.com and/or its successor registrars and in
25 the possession of Plaintiffs:

26 a. <marcrandazza.me>

27 b. <marcrandazza.com>

28 c. <marcjrandazza.com>

- d. <fuckmarcrandazza.com>
- e. <marcjohnrandazza.com>
- f. <marcrandazzasucks.com>
- g. <marcrandazzaisalyingasshole.com>
- h. <marcrandazza.biz>
- i. <marcrandazza.info>
- j. <marcrandazza.mobi>
- k. <marcrandazzaparody.com>
- l. <exposemarcrandazza.com>
- m. <randazzalegalgroupsucks.com>
- n. <trollmarcrandazza.com>
- o. <hypocritemarcrandazza.com>
- p. <crystalcoymarcrandazza.com>;

IT IS FURTHER ORDERED that, pursuant to 15 U.S.C. § 1125(d)(1), Google.com transfer control of all “Blogger” accounts and blogs containing “Randazza” to Plaintiffs:

- a. <marcjohnrandazza.blogspot.com>
- b. <randazzalegalgroup.blogspot.com>
- c. <marcrandazzaviolatedmylegalrights.blogspot.com>
- d. <markrandazza.blogspot.com>
- e. <marcrandazza.blogspot.com>
- f. <jenniferrandazza.blogspot.com>
- g. <marcrandazzafreespeech.blogspot.com>
- h. <marcrandazzaegomaniac.blogspot.com>
- i. <marcjrandazza-lawyer.blogspot.com>
- j. <marc-randazza.blogspot.com>
- k. <marcrandazzawomensrights.blogspot.com>
- l. <marcrandazza-asshole.blogspot.com>
- m. <marcrandazzatips.blogspot.com>